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June 9, 2020

VIA ECF

Hon. Vernon S. Broderick, USDJ
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: *Danforth et al. v. Town Sports International, LLC et al.*, Case No. 1:20-cv-03195-VSB

Dear Judge Broderick,

Plaintiffs respectfully request a 14-day extension to respond to Defendant Town Sports International Holdings, Inc.'s ("TSIH") Motion to Dismiss while the parties discuss the narrowing of issues raised in the motion and possible resolution of this matter. Counsel for Defendant TSIH has consented to the request. No counsel has entered an appearance for Defendant Town Sports International, LLC, service having been completed on the New York Secretary of State, and thus its consent could not be obtained. Plaintiffs' response is due June 9, 2020, and this is the first extension sought. No other dates will be affected by this request.

Therefore, Plaintiffs request a 14-day extension, until June 23, 2020, to respond to the Motion to Dismiss.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Zavareei", with a stylized flourish at the end.

Hassan A. Zavareei

cc: All Counsel of Record (via ECF)